

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 3:06-CR-192-N
	§	
ALDO SAENZ (28)	§	

AMENDED AGREED MOTION FOR CONTINUANCE REGARDING
SENTENCING AND COMPLETION OF PRESENTENCE REPORT

The government requests that the dates for the completion of the presentence reports be extended for at least 30 days. Defendant Saenz entered a plea of guilty to count one of the superseding indictment, and the Court set the sentencing date for August 11, 2008. The probation office was ordered to complete the presentence report by June 30, 2008. Based on the complexity of the case and in order that all relevant information is available to the probation department to complete its presentence report, the government requests that the date for the completion of the presentence report be extended for at least 30 days. The government and Saenz agree that the the sentencing date should be adjusted pursuant to this request.

Respectfully submitted,

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/s Daniel D. Guess

DANIEL D. GUESS

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CERTIFICATE OF CONFERENCE

On July 11, 2008, I spoke with Robert Montserrat, counsel for Aldo Saenz, who is in agreement with this motion.

/s Daniel D. Guess

DANIEL D. GUESS

Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2008, I electronically filed the foregoing document with the clerk of the court using the Electronic Case Filing "ECF" system which will send notification of such filing to the defense counsel.

s/ Daniel D. Guess

DANIEL D. GUESS

Assistant United States Attorney